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*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF JAMES LIN IN  
SUPPORT OF DEFENDANT OTTO  
TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS OPPOSITION TO  
MOTIONS TO QUASH**

Courtroom: F-15<sup>th</sup> Floor  
Magistrate Judge: Hon. Jacqueline Scott Corley  
Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, James Lin, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Opposition to Motions to Quash (the “Response”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

| Document  | Portions to Be Filed Under Seal | Designating Party |
|---|---------------------------------|-------------------|
| Letter Brief re Opposition to Motion to Quash   | Highlighted Portions            | Plaintiff         |
| Exhibit 3 to Declaration of Hayes Hyde – Excerpts from the transcript of the 30(b)(6) Deposition of Gary Brown, dated August 8, 2017. | Highlighted Portions            | Plaintiff         |
| Exhibit 4 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00012097.   | Entire Document                 | Plaintiff         |
| Exhibit 5 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084602 – 00084608.  | Entire Document                 | Plaintiff         |
| Exhibit 6 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER- 00083677 – 00083683.   | Entire Document                 | Plaintiff         |
| Exhibit 7 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER- 00084565 – 00084570.   | Entire Document                 | Plaintiff         |
| Exhibit 8 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084551 – 00084555.  | Entire Document                 | Plaintiff         |
| Exhibit 9 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084492 – 00084505.  | Entire Document                 | Plaintiff         |

|   |                      |           |
|---|----------------------|-----------|
| Exhibit 10 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084484 – 00084491.   | Entire Document      | Plaintiff |
| Exhibit 11 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084520 – 00084521.   | Entire Document      | Plaintiff |
| Exhibit 12 to Declaration of Hayes Hyde – Excerpts from the transcript of the Deposition of Kristinn Gudjonsson, dated July 28, 2017. | Highlighted Portions | Plaintiff |
| Exhibit 13 to Declaration of Hayes Hyde – Excerpts from the transcript of the Deposition of Sasha Zbrozek, dated August 18, 2017.     | Entire Document      | Plaintiff |
| Exhibit 14 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00083653-00083655.   | Entire Document      | Plaintiff |

3. The highlighted portions of the Letter Brief, the highlighted portions of Exhibits 3 and 12 to the Declaration of Hayes Hyde, and the entirety of Exhibits 4, 5, 6, 7, 8, 9, 10, 11, 13, and 14 to the Declaration of Hayes Hyde contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate.

4. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

5. Otto Trucking’s request to seal is narrowly tailored to those portions of the Response and its supporting documents that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 27th day of August, 2017 in Menlo Park, California.

/s/ James Lin  
JAMES LIN

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **August 27, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **August 27, 2017**.

/s/ James Lin  
JAMES LIN